

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	<b>Case No. 1:21-cr-00159-JPC</b>
Plaintiff	)	
	)	<b>Judge J. Philip Calabrese</b>
v.	)	
	)	
RICHARD GOULD,	)	
	)	<b>DEFENDANT'S MOTION FOR</b>
Defendant	)	<b><u>CONTINUANCE OF STATUS CONFERENCE</u></b>

The undersigned, counsel for Defendant Richard Gould in the above-captioned case, hereby respectfully requests that the status conference scheduled in the above-captioned case on July 18, 2022, be rescheduled to another date because of a conflict in counsel's trial schedule. In support thereof, the Defendant states;

- 1.) By court order issued on April 29, 2022, a status conference scheduled for June 2, 2022, in this case was rescheduled for July 18, 2022, at 3:00 p.m.
- 2.) Defendant's counsel is scheduled for a two day trial in Geauga County Court of Common Pleas scheduled to begin on July 18, 2022, at 9:00 a.m.
- 3.) Because of the scheduled trial in Geauga Count Defendant's counsel will not be able to attend the status conference in this case currently scheduled for 3:00 p.m. on July 18, 2022.
- 4.) Assistant United States Attorney Brian McDonough has been contacted and has no objection to this motion for continuance.
- 5.) At this point in time the schedules for Defendant's counsel, the Defendant, and Assistant United States Attorney Brian McDonough are open for the entire week of July 25, 2022, as a possibility for rescheduling the status conference in this case.

WHEREFORE, it is prayed that this motion be granted and the status conference be rescheduled.

Respectfully submitted,

*Carol A Szczepanik*

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**CERTIFICATE OF SERVICE**

A copy of this Motion for Continuance was sent to Assistant United States Attorney Brian McDonough on May 3, 2022, by e mail addressed to [Brian.McDonough@usdoj.gov](mailto:Brian.McDonough@usdoj.gov).

*Carol A Szczepanik*

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